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THE  
SANDERS FIRM, PC

July 9, 2021

Honorable Philip M. Halpern  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150

Tyson v. Town of Ramapo, et al. 17  
cv 4990 (KMK)

Dear Judge Halpern:

On June 26, 2021, prior to going on vacation, to finally resolve the alleged "dispute" Plaintiff sent over the most recent contact information in her possession regarding the potential non-party witnesses. Additionally, Plaintiff also completed updated HIPPA releases which once we receive them will be the third or fourth version of the same medical records already received by all parties. (Exhibit No.: 1) The original updated HIPPA releases were sent to both parties via the United States Postal Service.

In the interest of moving this case along, Plaintiff has tried in "good faith" to avoid filing her own motion to compel. Since the outset of this litigation, the Ramapo Defendants have refused to provide Plaintiff with "relevant" comparator data to investigate her legal claims. Frankly, the same easy to obtain "relevant" comparator data I have received in hundreds of other similar law enforcement cases. Without commenting upon every Ramapo Defendants response, please note the responses to Nos.: 4 – 6. (Exhibit No.: 2) Those particular non-party witnesses are Caucasian employees Plaintiff claims although allegedly injured, Ramapo Defendants "accommodated" them, carrying them as "full-duty" with no-show jobs or provided "light-duty" assignments they claim do not exist.

Therefore, the Ramapo Defendants motion to compel is resolved but, pending a response

The instant application to compel certain discovery is denied without prejudice to refiling, following compliance with the Court's Individual Practices Rule 4(D) which requires the parties to meet and confer.

In light of the representations in defendants' letter, the pre-motion discovery dispute letter (Doc. 76) is deemed withdrawn. The Clerk of Court is respectfully requested to terminate the letter-motion (Doc. 76).

SO ORDERED.

Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
July 9, 2021

pel Ramapo Defendants to provide  
uments Requests Nos.: 4 – 6.

ncerely,

Eric Sanders (ES0224)